

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROUND ROCK RESEARCH, LLC

Plaintiff,

v.

**ASUSTEK COMPUTER INC. and
ASUS COMPUTER INTERNATIONAL,
INC.**

Defendants.

C.A. No. 11-978-RGA

JURY TRIAL DEMANDED

**DECLARATION OF GODWIN YAN IN SUPPORT OF DEFENDANTS ASUSTEK
COMPUTER INC. AND ASUS COMPUTER INTERNATIONAL, INC.'S
MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER**

I, Godwin Yan, hereby declare that the following is true and correct:

1. I am an employee of ASUS Computer International, Inc. ("ASUS California"). I have been employed by ASUS California for the past four years and my current title is Senior Director of Operations.
2. ASUS California is a California corporation headquartered in Fremont, California.
3. ASUS California has no place of business and no employees in Delaware.
4. ASUS California does not own any real estate or bank accounts in Delaware.
5. ASUS California is not registered to do business in Delaware.
6. ASUS California does not have a registered agent of process in Delaware.
7. ASUS California does not own or control any subsidiaries in Delaware.
8. ASUS California does not design or manufacture any products in Delaware. In fact, ASUS California does not manufacture any products in the United States.
9. For the accused products in this case, ASUS California purchases its products and

receives them from ASUS Technology Pte Ltd. ("ASUS Singapore"). ASUS California generally receives the products at ports or airports in San Francisco, Oakland, or Los Angeles, in California, not in Delaware.

10. ASUS California does not store any of its products in Delaware. ASUS California stores its products in four warehouses: two in Fremont, California; one in Torrance, California; and one in Doral, Florida.

11. While Round Rock has not identified the specific accused products, ASUS California has not sold or imported at least the VW246H, UX21E, or UX31E products directly to Delaware. The total revenue from ASUS California's sale of other products in Delaware is approximately \$250,000 annually, which is less than 0.02% of ASUS California's total revenue.

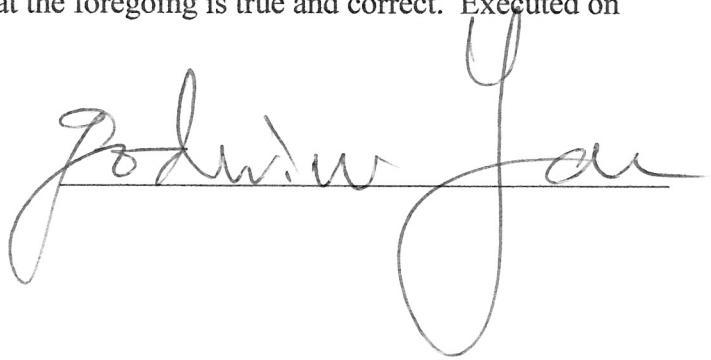
12. ASUS California does not advertise directly in Delaware.

13. I am not aware of any ASUS California employee traveling to Delaware on behalf of ASUS California.

14. None of the ASUS California witnesses or documents relevant to this case are located in Delaware. Since Round Rock has not identified all of the specific accused products or served initial disclosures, it is difficult to identify particular witnesses at this stage. Nevertheless, the ASUS California witnesses and documents relevant to this case will likely all be located in Fremont, California, because about 93% of ASUS California's employees (including myself) are based in Fremont, California.

15. For the limited purposes of this case, ASUS California is willing to submit to personal jurisdiction and venue in the United States District Court for the Northern District of California.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
December 23rd, 2011, in Fremont, California.

A handwritten signature in cursive script, appearing to read "John W. Lee", is written over a horizontal line.